



*South Carolina*  
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February 18, 2022

**VIA ELECTRONIC FILING**

The Honorable Jocelyn Boyd  
Chief Clerk/Executive Director  
The Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

RE: ND-2021-39-EG and ND-2021-40-EG  
**Comments Regarding Public Information Notice (PIN) Templates**

Dear Ms. Boyd:

The Department of Consumer Affairs (the "Department") submits this letter in response to the Commission's February 3, 2022 request for comments on its Public Information Notice (PIN) templates. The Department previously submitted comment letters in Docket 2020-247-A regarding Customer Bill Forms and recommended the Commission:

- 1) require font size to be no less than 12-point;
- 2) require headings to be in bold font; and
- 3) prohibit the use of full sentences in all capital letters ("all caps").

The Department noted these recommendations are commonly cited as methods to increase ease of reader comprehension. In that docket, AARP provided similar comments. AARP also discussed measuring reading grade levels and page design elements that would improve readability.

Regarding the current PIN templates, the Department recommends incorporating our previous suggestions and those of AARP. Notably, the proposed templates appear to adhere to the three suggestions above. To demonstrate revisions that would lower the reading level of the templates, I have attached a redline version of the Allowable Ex Parte Briefing PIN Template. The

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document provided by the Commission had a Flesch-Kincaid Grade Level of 15.9. The Department's revisions lower the grade level to 11.6.

The Commission's notices involve technical subject matter which can be difficult to present at a low reading grade level; however, we recommend the Commission utilize a readability tool to revise its documents whenever possible. Additionally, regarding the PIN templates, we recommend the following to improve readability in the event the releases are published verbatim by the media. These comments are based on the Allowable Ex Parte Briefing PIN Template, but apply to all of the templates:

- 1) Use bold font or white space to easily distinguish any important dates for the reader.
- 2) Break up long paragraphs into shorter ones whenever possible.
- 3) When providing "more context on the docket", convey only relevant information and do so as simply as possible.
- 4) Use consistent formatting throughout the entire document for phone numbers, dates and addresses, including in headers and footers,
- 5) When providing website links, either include the entire link or use descriptive terms for hyperlinks. For example, rather than state "the briefing can be found at this [link](#)", state "the briefing can be found at <https://www.scetv.org/live/public-service-commission>" or "the briefing can be found [here on SCETV](#)." Consumers are hesitant to click blind links; therefore, providing more detail in the link can improve the chances that the link is accessed.

Once again., the Department greatly appreciates the Commission's efforts to improve its public communications. Please let me know if we can be of further assistance.

Regards,



Roger Hall, Esq.  
*Deputy Consumer Advocate*

## SUGGESTED REVISIONS TO IMPROVE READABILITY

### Allowable Ex Parte Briefing PIN Template

During ~~the Commission's~~ Business Meeting of (DATE), the Public Service Commission of South Carolina (PSC) requested an allowable ex parte briefing related to (SUBJECT). The briefing ~~has been~~ is scheduled for (DATE and TIME) ~~in~~ at the PSC Hearing Room at 101 Executive Center Drive, Suite 100, Columbia, SC 29210. ~~Interested persons~~ The public may attend in person ~~at the Commission Office~~ or ~~may~~ register to attend virtually.

An allowable ex parte briefing ~~refers to~~ is a form of communication between the ~~Public Service Commission PSC of South Carolina~~ and a person involved in a PSC docket. ~~These briefings before the Commission that are~~ are conducted in accordance with SC Code Annotated section 58-3-260(c)(6). Allowable ex parte briefings allow ~~the opportunity for~~ the PSC to receive information from persons involved in utility matters ~~that come before or are likely to come before the Commission~~ without violating the ethical standards to which the PSC Commission adheres.

Registration is required for all attendees so that the record can be certified as required by law. ~~and For those attending in person,~~ registration will be available upon ~~your~~ arrival at the PSC Commission's office. Preregistration is required for all those who attend virtually or wish to watch the real-time broadcast. ~~and~~ The preregistration link is available here (link to SurveyMonkey). A recording of the briefing may be viewed online once it concludes. ~~The livestream broadcast will be available after the briefing concludes.~~

(MORE CONTEXT ON THE DOCKET) (Include Office of Regulatory Staff and ~~Office~~ Department of Consumer Affairs recommendations as pertinent and available.)

More information about this briefing can be found at this link (link to NDI). ~~and~~ Footage of the ~~PSC's discussion at the~~ (DATE) business meeting can be viewed ~~found~~ at this link (link to SCETV video). For more information, please reach out to the ~~Public Service Commission~~ PSC at 803.896.5100 or at [contact@psc.sc.gov](mailto:contact@psc.sc.gov).